

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AAKASH DALAL,

Plaintiff,

v.

CLEARVIEW AI, INC., ABC Corporations
1-200, and John Does 1-200,

Defendants.

Civil Action No.: 2:24-cv-10380-SDW-AME

**AFFIDAVIT OF THOMAS MULCAIRE IN
SUPPORT OF DEFENDANT CLEARVIEW
AI, INC.'S MOTION TO DISMISS FOR
LACK OF PERSONAL JURISDICTION**

STATE OF MARYLAND)
)ss.:
COUNTY OF ANNE ARUNDEL)

I, Thomas Mulcaire, under oath and penalty of perjury, being duly sworn, hereby affirms and says:

1. I am the Chief Legal Officer of defendant Clearview AI, Inc. I have personal knowledge of the following facts, except where otherwise indicated, and if called as a witness I could and would competently testify as stated.

2. Clearview is a corporation organized and existing under the laws of the State of Delaware, with its principal mailing address at 99 Wall Street #5730, New York, New York. Clearview's CEO and founder, Hoan Ton-That, is the company's principal decision-maker. He resides and works in California.

3. Clearview does not currently do business in New Jersey and has not provided any services to any agencies, persons or businesses there since early 2020.

4. Clearview's databases are not stored on servers in New Jersey. Clearview utilizes servers in Virginia.

5. Customers of Clearview do not have and have never had access to Clearview's database of face vector data, which hold the alleged "biometric data" at issue in this case.

6. At no time has Clearview had any office, officers, employees, agents or representatives operating in the State of New Jersey

7. At no time has Clearview owned, leased and/or rented any real property in New Jersey.

8. Clearview does not maintain, and never has maintained, any bank accounts in the State of New Jersey.

9. Clearview does not advertise within the State of New Jersey and does not otherwise advertise any product or service specifically for sale in the State of New Jersey.

10. Clearview does not currently solicit business within the State of New Jersey.

11. Clearview does not currently sell any product or service directly into the State of New Jersey.

12. Clearview has not purposefully availed itself of the benefits of doing business in the State of New Jersey.

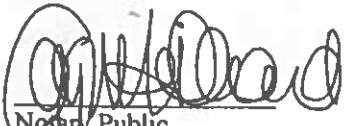
13. Although Clearview does maintain a website that is accessible by potential customers, products cannot be purchased directly from the website and the website does not target residents of the State of New Jersey and does not target sales in the State of New Jersey.

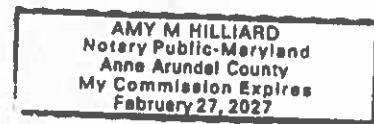
14. Clearview has not and does not and will not voluntarily consent to the general exercise of personal jurisdiction over it by any court within the State of New Jersey.

15. Requiring Clearview to defend a lawsuit filed against it in the State of New Jersey will create undue hardship since all of its employees, officers, documents, facilities and asserts are located elsewhere.


THOMAS MULCAIRE

Sworn and subscribed to before me
On this 22 day of November, 2024


Notary Public



My Commission expires: February 27, 2027